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May 20, 2019

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By E-Mail

Honorable Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

Re: *United States v. Anilesh Ahuja, et al.*
18 Cr. 328 (KPF)

Dear Judge Failla:

We write on behalf of Defendant Jeremy Shor to respectfully request permission to file under seal or in redacted form exhibits to our forthcoming opposition to the Government's motions *in limine* and to redact in the publicly-filed version of the brief those portions that quote from or reference those documents. We seek this relief in accordance with Paragraph 4 of the Protective Order in the above-captioned matter. Paragraph 4 of the Protective Order provides that a filing containing confidential information shall "be made with all Confidential Information redacted and a complete version filed with the Court under seal." (Dkt. No. 34 ¶ 4.) Mr. Shor's forthcoming motion will cite and attach documents produced by the Government—including Jencks Act material—designated as confidential.

Respectfully submitted,



Daniel S. Ruzumna

cc: Counsel of Record

Application GRANTED.

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE

Dated: May 20, 2019
New York, New York